

3.600 St. Louis County  
West Lake Demolition Landfill

October 31, 1977

Mr. William Canney  
West Lake Landfill, Inc.  
Rt. 1, Box 206  
Bridgeton, MO 63044

Dear Mr. Canney:

This is to follow up on the inspection of the West Lake Demolition Landfill on October 4, 1977, by a representative of the Missouri Department of Natural Resources. As a result of this inspection, the following unsatisfactory features are noted and recommendations for their correction are given.

UNSATISFACTORY FEATURES:

1. Non-demolition landfill waste including wastes not even acceptable at sanitary landfills were being deposited at the demolition landfill site.
2. Routine techniques of spreading and compacting the demolition wastes were not being practiced.

COMMENTS AND RECOMMENDATIONS:

1. A considerable amount of paint sludge in 55 gallon metal drums had been disposed of on the site. It appeared that the majority of the paint sludge had been mixed with soil and had caused one area to be very odorous and extremely damp. Neither the demolition or sanitary landfill should be accepting any quantity of paint or other sludges. It is understood that a small amount might get into the landfill undetected but, it was obvious that a good portion of the sludge could and should have been turned away. Immediate steps must be taken to stop all incoming deposits of such materials and to immediately remove such materials when they somehow are dumped. (Section 80-4.010 (2) (A) of the Missouri Solid Waste Rules and Regulations lists the types of materials to be accepted at a demolition landfill. Enclosed is one copy of the Rules and Regulations.

*recorded*

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BUREAU OF  
SOLID WASTE MANAGEMENT

Site:	West Lake Old
ID #	MO 5079900932
Break:	17.8
Other:	10-31-77

40241215



SUPERFUND RECORDS

DNR 0223

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**October 28, 1977**

2. Acceptance of non-demolition wastes has been observed in the past at the demolition landfill site. It is felt that it is a combination of an inadequate sign listing the wastes to be accepted, inadequate inspection of loads coming in and a willingness to accept such non-demolition materials when they are on site. Section 80-4.010 (2) (C) 2 requires that a list of wastes to be accepted be displayed prominently at all site entrances. No sign was observed at either entrance for the demolition landfill. A sign listing the waste to be accepted must be erected at all entrances to the demolition landfill. A responsible supervisor should be located on site who is willing to thoroughly inspect every load that comes in and to reject all non-demolition materials. Anyone caught dumping non-demolition wastes should be forced to remove such wastes to a proper disposal facility. The combination of advising prospective dumpers of what wastes are accepted via the landfill sign along with a responsible supervisor who is knowledgeable about what wastes can and cannot be accepted should result in a great reduction in non-demolition wastes being dumped at the demolition landfill.
3. It was observed that the demolition materials were being dumped at the top of the working face of the landfill and for the most part simply pushed over the edge of the face. Very little compaction was being accomplished. It was understood that some bulky wastes such as large concrete blocks and tree trunks cannot be compacted but, the majority of the other demolition wastes can be spread and compacted in layers around two feet thick on or near a 3 to 1 slope. If possible, it is recommended that the demolition wastes be dumped at the base of working face. Whether the wastes are dumped at the top or base of the working face, every effort must be made to spread and compact the demolition wastes in layers not to exceed two (2) feet as much as practical from the standpoint of the size and shape of the materials. If a load is observed containing large materials that could hinder the proper compaction of other demolition wastes, it should be dumped where it can be more easily handled instead of with the other wastes. Section 80-4.010 (12) (C) 1 requires that solid waste handling equipment shall be capable of :
  1. Spreading and compacting the solid wastes accepted in layers no more than two feet thick, when practical from size and shape of the waste material, while confining it to the smallest practical area.
  2. Compact the solid waste to the smallest practical volume.
  3. Place, spread and compact the cover material as much as practical.
4. An extensive salvage operation was being run at the demolition

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landfill mainly for the collection of metallic objects.

It was understood that the salvaged materials are hopefully removed from the site the same day they are collected. The landfill must be commended for the extensive salvage operation but, every effort must be made to remove the salvaged material daily or to keep them neatly stored on site.

15. It was observed that the required twelve (12) inches of weekly cover material had been applied and had been properly compacted any areas that have been brought up to final grade should contain final cover consisting of at least two feet of compacted soil and be properly seeded.

If you have any questions concerning the above comments and recommendations, please feel free to give us a call at our St. Louis Office. Reinspections will be made to insure that any non-demolition materials are not being accepted and the materials accepted are being properly compacted.

APPROVED:

SUBMITTED BY:

Earl F. Holteraewe, P.E.  
Regional Administrator  
St. Louis Regional Office  
Department of Natural Resource

Bud Stein  
Environmental Engineer I  
St. Louis Regional Office  
Department of Natural Resources

EFH/BS/lb

CC: Earl Breadon  
2337 Telegraph Road  
St. Louis, MO  
St. Louis County Health Department  
CO,SW

MISSOURI DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF ENVIRONMENTAL QUALITY

DEMOLITION LANDFILL SURVEILLANCE RECORD

Date: 10-4-77 Days/Week Open: 6  
Name of Demolition Landfill: West Lake Landfill, Inc. Demolition Landfill  
Permit No: 218903 County: St. Louis County  
Owner: West Lake Inc. Operator: Same as owner  
Address: Route 1, Box 206 Address: \_\_\_\_\_  
Bridgeton, Mo 63044

I. Special Conditions and Approved Modifications

A. Are there any special conditions or approved modifications of the satisfactory compliance subsections of the rules and regulations? (e.g. impermeable barrier, limited excavation, exceptions to weekly cover requirements)  
\_\_\_\_\_ Yes X No

B. Is the demolition landfill operation in compliance with the special conditions or approved modifications? (If "No," describe violations under "REMARKS.")  
\_\_\_\_\_ Yes \_\_\_\_\_ No

II. Check Types of Waste Accepted

	INDICATED ON PERMIT APPLICATION	REPORTED BY OPERATOR	AS OBSERVED
Demolition and construction waste .....			<u>X</u>
Brush and untreated wood waste .....			<u>X</u>
Tires .....			<u>X</u>
Inert Plastics .....			
<u>paint sludge, cardboard waste</u> OTHER WASTES (SPECIFY)			<u>X</u>
_____			
_____			
_____			

III. Remaining Life of Landfill

A. Estimated average volume of compacted solid waste received.  
\_\_\_\_\_ (tons, yards/day, week) unknown

B. Estimated volume of remaining landfill covered by approved engineering plans.  
\_\_\_\_\_ acre feet

#### IV. Satisfactory Compliance Subsections Regulations 80-4.010

Check all subsections: SAT — Satisfactory; UNS — Unsatisfactory. (If necessary, describe "UNS" violations under "Remarks.")

SUBSECTION NUMBER	SATISFACTORY COMPLIANCE OPERATING PROCEDURE	SAT	UNS
2) SOLID WASTE ACCEPTED			
2)(C)1	Routine sanitary landfill techniques of spreading and compacting solid waste shall be used as much as practicable to dispose of solid waste in a demolition landfill.		X
2)(C)2	A list of wastes to be accepted shall be displayed prominently at the site entrance.		X
3) SOLID WASTE EXCLUDED			
3)(C)1	A responsible supervisor shall be present at the disposal area at all times when the area is open to receive waste.	X	
3)(C)2	Excluded wastes deposited removed to an approved disposal site.		X
4) SITE SELECTION			
4)(C)	Site accessible by all-weather roads.	X	
6) WATER QUALITY			
6)(C)1	Surface water courses and runoff satisfactorily diverted from the landfill. Demolition landfill construction and grading to promote rapid surface water runoff without excessive erosion.	X	
6)(C)2	Decomposable solid wastes deposited above predicted maximum water table.	X	
7) AIR QUALITY			
7)(C)	No open burning without written permission from the agency having jurisdiction.	X	
8) GAS CONTROL			
8)(C)1	Decomposition gases adequately vented to prevent danger to occupants of adjacent property.	X	
8)(C)2	Gases vented to prohibit explosive or toxic accumulations.	X	
9) VECTORS			
9)(C)	Vector control programs implemented when necessary.	X	
10) AESTHETICS			
10)(C)1	Litter collected and compacted into cell be utilized daily.	X	
10)(C)2	Wastes easily moved by wind covered as necessary.	X	
10)(C)3	On-site vegetation and natural windbreaks being utilized for litter control and aesthetic appearance.	X	

SUBSECTION NUMBER	SATISFACTORY COMPLIANCE OPERATING PROCEDURE	SAT	UNS
(10) AESTHETICS (continued)			
(10)(C)4	Salvaged materials removed daily or stored in aesthetically acceptable manner. <i>could be better</i>	X	
(11) COVER MATERIAL			
(11)(C)1	Twelve (12) inches compacted soil cover material applied at least once every seven calendar days.	X	
(11)(C)2	Final cover of at least two (2) feet compacted soil applied on all completed areas.	X	
(12) COMPACTION			
(12)(C)1A	Solid waste spread in layers not to exceed two (2) feet as much as practical.		X
(12)(C)1B	Solid waste compacted to smallest practical volume.		X
(12)(C)1C	Cover material compacted as much as practical.	X	
(12)(C)2	Equipment available and operated to spread and compact the solid waste as received or at least when the accumulated waste reaches 200 cubic yards.		X
(12)(C)3	No solid waste disposed of in water where the water interfered with spreading and compacting or where the water is causing a mosquito problem.	X	
(13) SAFETY			
(13)(C)1	Fire extinguishers provided on all equipment.		
(13)(C)2	Provisions for extinguishing fires in waste, equipment or structures.		
(13)(C)3	Scavenging prohibited.	X	
(13)(C)4	Controlled access limited to operating hours.	X	
(13)(C)5	Traffic control signs provided.	X	
(13)(C)6	Dust control adequate.	X	
(14) RECORDS			
(14)(C)1A	Records of complaints and major problems.		
(14)(C)1B	Records of dates of cover material application.		
(14)(C)1C	Records of vector control efforts.		
(14)(C)1D	Records of dust and litter control efforts.		
(14)(C)1E	Records of quantity of waste received.		
(14)(C)2	Records of location of general types of wastes and depth of fill.		

#### V. Operation Proceeding in Accordance With Approved Engineer Plans? (If "No," describe violations under "Remarks.")

X Yes        No

REMARKS *Paint sludges being disposed in vicinity of demolition landfill; dumping at top, pushing over edge, cliff method, therefore poor compaction; they need better sign and better control of materials coming in; extensive salvage operation; apparently salvaged materials hauled daily.*

(Attach additional sheets as necessary.)

BY

*Bud Stein*

SIGNATURE OF INVESTIGATOR

TABLE I - Results of Analysis of Leachate From  
Westlake Landfill, Incorporated (1/23/78)

<u>PARAMETER</u>	<u>CONCENTRATION</u>
1. pH (Std. Units)	6.0
2. Specific Conductance ( $\mu$ mhos/cm)	3170
3. Alkalinity as $\text{CaCO}_3$ (mg/l)	475
4. Acidity as $\text{CaCO}_3$ (mg/l)	415
5. Total Solids (mg/l)	4030
6. Suspended Solids (mg/l)	392
7. Volatile Suspended Solids (mg/l)	223
8. Grease (mg/l)	56
9. Chemical Oxygen Demand (mg/l)	3820
10. Total Organic Carbon (mg/l)	1090
11. Phenol (mg/l)	1.02
12. Fluoride (mg/l)	0.5
13. Chloride (mg/l)	330
14. Cyanide (mg/l)	<0.1
15. Kjeldahl Nitrogen as N (mg/l)	83.2
16. Sulfate (mg/l)	580
17. Sulfide (mg/l)	<0.1
18. Surfactant (MBAS) (mg/l)	0.5
19. Chromium (mg/l)	<0.5
20. Copper (mg/l)	1.60
21. Iron (mg/l)	31.0
22. Lead (mg/l)	<0.5
23. Nickel (mg/l)	<0.3
24. Zinc (mg/l)	10.8